

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREA STRAUB,

Plaintiff,

v.

CBS BROADCASTING INC.,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

Civ. Action No. 14-cv-5634-MMB

**MOTION *IN LIMINE* NO. 4 OF DEFENDANT CBS3 TO PRECLUDE
REFERENCES TO GUIDELINES OF OTHER NEWS ORGANIZATIONS**

Defendant CBS Broadcasting Inc. (“CBS3”) respectfully moves, pursuant to Local Rule 7.1 and this Court’s Order, *in limine*, to preclude references to journalistic standards promulgated by other news organizations. In support of its Motion, CBS3 hereby incorporates by reference its accompanying Memorandum of Law, and all accompanying documents.

Dated: April 29, 2016

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: /s/ Gayle C. Sproul

Gayle C. Sproul (GCS8092)

Michael D. Sullivan (admitted *pro hac vice*)

Mara J. Gassmann (admitted *pro hac vice*)

1760 Market Street, Suite 1001

Philadelphia, PA 19103

Tel: (215) 988-9778

Fax: (215) 988-9750

gsproul@lskslaw.com

msullivan@lskslaw.com

mgassmann@lskslaw.com

Attorneys for Defendant CBS Broadcasting Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused the foregoing Motion and all accompanying documents to be served upon all counsel of record via the Court's CM/ECF system.

Dated: April 29, 2016

/s/ *Gayle C. Sproul*
Gayle C. Sproul